



HON. SYLVIA O. HINDS-RADIX  
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THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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July 11, 2023

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Juan Solano v. City of New York, et al.  
23 Civ. 3285 (PGG)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York, and attorney for defendant City of New York in the above-referenced matter. Defendant City writes to respectfully request that the Court (1) adjourn the July 20, 2023 initial pretrial conference until such time after the parties fulfill all requirements set forth by Local Rule 83.10 (“the Plan”), and (2) extend a corresponding adjournment for the parties to submit the July 13, 2023 joint letter and case management plan. This is defendant City’s first such request. Plaintiff’s counsel does not object to this request.

By way of background, plaintiff Juan Solano brought this action, pursuant to 42 U.S.C. § 1983, against the City of New York and New York City Police Department (“NYPD”) Detective Michael Corvi, alleging claims of, *inter alia*, malicious prosecution and denial of due process and a fair trial, as well as a New York state law claim of negligent hiring, training and supervision. On April 19, 2023, the Court designated this case as part of the Plan. See ECF Entry, Notice, April 19, 2023. Based on the date defendant City received plaintiff’s unsealing release, defendant City’s deadline to answer or otherwise respond to the Complaint is July 13, 2023. Thereafter, the parties will exchange initial disclosures, limited discovery, a settlement demand, a settlement offer, and participate in a mediation in accordance with the Plan.

As such, defendant City respectfully requests an adjournment of the initial conference and deadlines to submit a joint letter and case management plan in order to proceed in accordance with the Plan, which is designed to reach early resolution of matters without the need for Court intervention or involvement.

Accordingly, defendant City respectfully requests that the Court (1) adjourn the July 20, 2023 initial pretrial conference until such time after the parties fulfill all requirements set forth by the Plan, and (2) extend a corresponding adjournment for the parties to submit the July 13, 2023 joint letter and case management plan.

Defendant City thanks the Court for its consideration herein.

Respectfully submitted,

/s/ Gregory J.O. Accarino

Gregory J.O. Accarino

*Senior Counsel*

Special Federal Litigation Division

cc: **By ECF:**  
Evan Brustein, Esq.  
*Attorney for Plaintiff*

**MEMO ENDORSED:** The conference is adjourned to October 26, 2023 at 10:30 a.m. in Courtroom 705 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York.

SO ORDERED.



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Paul G. Gardephe  
United States District Judge  
**Date: July 14, 2023**